

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF LOUISIANA**

DAVID M. WASHINGTON,

Plaintiff,

v.

THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA,

Defendant.

CIVIL ACTION NO. 2:19-cv-00030-CJB-  
DMD

Judge Carl Barbier

Magistrate Judge Dana Douglas

**MOTION TO TRANSFER VENUE**

Now comes Defendant, The Prudential Insurance Company of America (“Prudential”), by and through its attorneys, pursuant to 28 U.S.C. § 1404(a), for reasons more fully explained in the accompanying memorandum submits this motion to transfer venue. Prudential respectfully submits that it is apparent on the face of the complaint and review of applicable statutes that this Court should transfer this case to the Western District of Louisiana or the District of New Jersey.

DATED: February 15, 2019

Respectfully submitted,

By: /s/ Patricia S. LeBlanc

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*Attorneys for Defendant*  
THE PRUDENTIAL INSURANCE  
COMPANY OF AMERICA

**CERTIFICATE OF SERVICE**

I, the undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system this 15th day of February 2019. Any other counsel of record will be served by facsimile transmission and/or first class mail.

Reagan Toledano  
James F. Willeford  
Willeford & Toledano  
201 St. Charles Avenue, Suite 4208  
New Orleans, Louisiana 70170

*/s/ Patricia S. LeBlanc*

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Patricia S. LeBlanc